



February 1, 2000

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
Commonwealth of Massachusetts  
One South Station, 2<sup>nd</sup> Fl.  
Boston, MA 02110

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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New England Telephone and Telegraph Company )  
d/b/a Bell Atlantic-Massachusetts- Section 271 of the )  
Telecommunications Act of 1996 Compliance Filing )

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D.T.E. 99-271

**MEMORANDUM IN OPPOSITION OF KPMG'S PROPOSAL TO WEAKEN THE  
MASTER TEST PLAN**

Dear Secretary Cottrell:

NEXTLINK would like to again support the comments filed by AT&T on January 31, 2000, concerning KPMG's proposal to weaken the Master Test Plan. NEXTLINK agrees that the sudden decision by KPMG to significantly weaken the volume and stress testing of Bell Atlantics' ("BA") systems significantly compromises the 271 proceeding. Given the considerable problems that numerous CLEC's, including NEXTLINK, are experiencing in Massachusetts and New York, allowing the proposed reductions to take place puts the CLEC community and Massachusetts consumers at serious risk to the adverse impact of a system that is incapable of handling commercial volumes. The extreme failures of BAs' systems concerning over 30,000 New York orders being lost indicates that the Master Test Plan needs to be re-examined and strengthened NOT weakened. For the reasons stated above and indicated in AT&T's Emergency Motion, the DTE should not allow KPMG to weaken the Master Test Plan.

Sincerely,

Michael D'Angelo  
Director, Regulatory Affairs